

## **REMARKS**

Specification has been amended. Claims 1, 11 and 21 have been amended and claim 20 has been cancelled.

The Examiner has objected to applicant's Abstract because it exceeds the maximum number of words. Applicant has amended Abstract of the Invention to limit it to 103 words, thereby obviating the Examiner's objection.

The Examiner has rejected applicant's claims 21 and 22 under 35 USC 101 because the claimed invention is directed to non-statutory subject matter. In particular, the Examiner has pointed out that claim 21 is directed to a computer-readable program and fails to claim the program recorded on an appropriate computer readable medium so as to be structurally and functionally interrelated to the medium and permit the function of the claimed invention to be realized. Applicant has amended applicant's claim 21 to recite "a computer-readable control program stored on a computer-readable storage medium for causing a computer to implement..." and claim 22 to recite "a computer-readable storage medium storing a computer-readable control program...". Applicant believes that applicant's claims 21 and 22, as amended, structurally and functionally interrelate the computer-readable program with the computer-readable storage medium on which the program is stored, and are thus directed to statutory subject matter. Applicant therefore submits that amended claims 21 and 22 are in compliance with 35 USC 101.

The Examiner has rejected applicant's claims 1, 3, 11 and 13 under 35 USC 102(b) as being anticipated by the Suga, et al. (U.S. Patent No. 6,313,875) patent. Applicant's claims 2, 12, 21 and 22 have been rejected under 35 USC 103(a) as being unpatentable over the Suga, et al. patent. Claims 4-6, 9-10, 14-16 and 19-20 have been rejected under 35 USC 103(a) as being

unpatentable over the Suga, et al. patent in view of the Enright, et al. (U.S. Patent No. 6,583,813) patent and claims 7, 8, 10, 17, 19 and 20 have been rejected under 35 USC 103(a) as being unpatentable over the Suga, et al. patent in view of the Enright, et al. patent, further in view of the Hatanaka (U.S. Pat. No. 6,438,320) patent. Applicant has amended applicant's independent claims 1, 11, 21 and 22, and with respect to these claims, as amended, and their respective dependent claims, the Examiner's rejections are respectfully traversed.

Applicant's independent claim 1 has been amended to recite an image pickup apparatus comprising an image pickup device, a recording device that records image data photographed by the image pickup device, a display device that displays the image data recorded by the recording device, a communication device that is connectable to a plurality of image pickup apparatuses, for transmitting and receiving the recorded image data, an allotting device that allots unique apparatus information for identifying the image pickup apparatus to the photographed image data, and a control device that provides control to cause the display device to display the image data received by the communication device from respective ones of the plurality of image pickup apparatuses and the image data recorded by the recording device, with the unique apparatus information and specific information for specifying the image data, wherein the control device provides control to cause the display device to display the image data received by the communication device from respective ones of the plurality of image pickup apparatus and image data recorded by the recording device in different display configuration, respectively, in a manner such that the image data received by the communication device from respective ones of the plurality of image pickup apparatuses and the image data recorded by the recording device can be distinguished from one another. Applicant's independent claims 11, 21 and 22 have been similarly amended.

The constructions recited in applicant's amended independent claims 1, 11, 21 and 22 are not taught or suggested by the cited art of record. In particular, the Examiner has argued that the Sura, et al. patent discloses a control device (FIG. 2 reference no. 122) that provides control to cause the display device to display the image data received by the communication device from respective ones of the image pickup apparatuses and the image data recorded by the recording device, using the unique apparatus information, in a manner such that the image data received by the communication device from respective ones of the plurality of image pickup apparatuses and the image data recorded by the recording device can be distinguished from one another (FIG. 5 and FIG. 1) since Terminal Station A both show the display of the image pickup apparatus with a plurality of images from the various image pickup devices and can be distinguished from one another by the label on the title bar of each image.

Applicant has reviewed the portions of the Suga, et al. patent cited by the Examiner and believes that there is no teaching or suggestion in the Suga, et al. patent of a control device that provides control to cause the display device to display the image data received by the communication device from respective ones of the plurality of image pickup apparatuses and the image data recorded by the recording device, with the unique apparatus information and specific information for specifying the image data. Specifically, the Suga, et al. patent only teaches displaying on a display device, i.e. monitor, a plurality of display windows, each display window corresponding to an image taking device, i.e. camera, and including a title bar (315) in which a name of the display window identifying the name of the camera is displayed. FIGS. 1, 5 and 6; Col. 6, lines 42-47; Col. 7, lines 13-18. Thus, in Suga, et al., the display device displays the image data recorded by the recording device and/or received by the communication device from the plurality of image pickup apparatuses only with the name or

number of the corresponding image pickup apparatus in the title bar, and not with any specific information for specifying the image data.

Moreover, there is no teaching or suggestion in Suga, et al. of the control device causing the display device to display the image data received from the communication device from respective ones of the plurality of the image pickup apparatuses and the image data recorded by the recording device in different display configuration, respectively, so that the image data received by the communication device can be distinguished from the image data recorded by the recording device. As indicated by the Examiner, the source of the image data being displayed in each window can be distinguished from the sources of the other windows by the label on the title bar of each display window. However, as shown in FIGS. 1 and 5 of the Suga, et al. patent, the configuration of the display windows displaying image data received by the communication device from the respective ones of the plurality of image pickup apparatuses is the same as the configuration of the display window displaying image data recorded by the recording device. Accordingly, there is no mention or any suggestion in the Suga, et al. patent of displaying the image data received by the communication device and image data recorded by the recording device in different display configurations so that the image data received by the communication device and the image data recorded by the recording device can be distinguished from one another.

Applicant's amended independent claims 1, 11, 21 and 22, each of which recites providing control to cause the display device to display the image data received by the communication device from respective ones of the plurality of image pickup apparatuses and the image data recorded by the recording device with the unique apparatus information and specific information for specifying the image data, wherein the control is provided to cause the

display device to display the image data received by the communication device from respective ones of the plurality of image pickup apparatus and the image data recorded by the recording device in different display configuration, respectively, in a manner such that the image data received by the communication device from respective ones of the plurality of image pickup apparatuses and the image data recorded by the recording device can be distinguished from one another, thus patentably distinguish over the Suga, et al. patent. Moreover, there is nothing added by the Enright, et al. and the Hatanaka patents to change this conclusion.

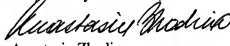
In view of the above, it is submitted that applicant's claims, as amended, patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is respectfully requested.

If the Examiner believes that an interview would expedite consideration of this Amendment or of the application, a request is made that the Examiner telephone applicant's counsel at (212) 790-9286.

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Respectfully submitted,

  
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